

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
TAMPA DIVISION**

UNITED STATES OF AMERICA,

**Case No. 8:03-CR-77-T-30TBM**

v.

SAMI AMIN AL-ARIAN, et al.,

Defendants.

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**MOTION FOR EXTENSION OF TIME TO FILE RESPONSE, OBJECTIONS  
AND MEMORANDA IN SUPPORT THEREOF TO GOVERNMENT'S  
MOTIONS IN LIMINE # 1-4**

COMES NOW the Accused, Dr. SAMI AMIN AL-ARIAN, by and through his undersigned counsel, and pursuant to Local Rule 3.01, requests this Honorable Court to extend the time permitted for filing a response and objections to the government's Motions in Limine Nos. 1-4 to Thursday, May 5, 2005. As grounds for said Motion, the following is alleged:

1. On Friday, April 22, 2005, undersigned counsel received the Government's Motions in Limine Nos. 1-4 to preclude certain affirmative defenses and to exclude evidence.
2. Within the last few days, counsel on behalf of Dr. Al-Arian filed a lengthy Motion for Change of Venue which diverted considerable time from the preparation of our response to the above referenced motions in limine.

3. Additionally, in the last few weeks, the government has sent counsel over 150 additional translations of recorded conversations, which has also diverted considerable time from the preparation of our responses.
4. Defense counsel anticipates the filing of two (2) separate Responses with accompanying memoranda of law to the motions referenced above.
5. Defense counsel has been diligent and expended considerable time in preparing the various motions on behalf of Dr. Al-Arian. However, a few more days is required in order to complete the legal memoranda in support of these motions.
6. Because of the importance of the legal issues involved, counsel requests the additional time of 3 days to fully brief the relevant law.

WHEREFORE, the Accused requests this Honorable Court to extend the time for the filing of a response to the Government's Motion an additional 3 days to May 5, 2005.

Dated: May 2, 2005

Respectfully Submitted,

/s/ William B. Moffitt  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 2<sup>nd</sup> day of May, 2005, a true and correct copy of the foregoing has been furnished, by CM/ECF, to Walter Furr, Assistant United States Attorney; Terry Zitek, Assistant United States Attorney; Kevin Beck, Assistant Federal Public Defender, M. Allison Guagliardo, Assistant Federal Public Defender, counsel for Hatim Fariz; Bruce Howie, Counsel for Ghassan Ballut, and to Stephen N. Bernstein, counsel for Sameeh Hammoudeh.

/s/ Linda Moreno  
Linda Moreno  
Attorney for Sami Al-Arian